
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Junwen Jiang

Write the full name of each plaintiff.

CV _____
(Include case number if one has been assigned)

-against-

JPMorgan Chase Bank, N.A.

COMPLAINT

Do you want a jury trial?

Yes No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question**
- Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Fair Credit Reporting Act, Truth in Lending Act

Intentional Infliction of Emotional Distress, Negligent Infliction of Emotional Distress

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
 (Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, JPMorgan Chase Bank, N.A., is incorporated under the laws of
 the State of Delaware

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Junwen

C

Jiang

First Name

Middle Initial

Last Name

7 Rye Ridge Plaza #340

Street Address

Westchester, Rye Brook New York 10573

County, City

State

Zip Code

(646)589-4830

tvos20170218@gmail.com

Telephone Number

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: JPMorgan Chase Bank, N.A.

Business Name

Current Job Title (or other identifying information)

700 Kansas Lane

Current Work Address (or other address where defendant may be served)

Ouachita Parish, Monroe Louisiana 71203

Defendant 2:

First Name _____ **Last Name** _____

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name _____ **Last Name** _____

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: Online or some locations of the Defendant

Date(s) of occurrence: February and March of 2025

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

My Chase Bank business credit card ending in 2363 was opened in the year 2019; and, during the period of over 5 years from 2019 to 2024, Defendant had never reported any information with this business credit card in my personal credit file at Equifax, TransUnion or Experian, which means that Defendant had never tried to bind my personal responsibility to this business credit card. Unfortunately, Defendant wrongfully reported this business credit card to my personal credit reports in early March 2025 (or late February 2025), which had caused me emotional distress, anxiety and depression etc.
On March 18, 2025, in its response to my complaint against the Defendant at Consumer Financial Protection Bureau, Defendant verified that my business card account ending in 2363 was incorrectly reported to my personal credit file, but declined my request for compensation, see Exhibit A for details.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I was devasted as soon as I noticed the business credit card ending in 2363 from my credit report.

The extremely high balance of the business credit card that will destroy my personal credit file had caused me great distress and deep anxiety; then I worried my poor credit score may cause the loss of my credit cards, mortgages, business and all sources of income for my family, as a result, I started to suffer deep depression

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

1. Defendant must compensate me for the emotional distress, anxiety and depression etc. caused by the wrongfully reported information, at an amount determined by Jury.
2. Defendant must pay punitive compensation for the wrongly reported information in my personal credit file
3. Defendant must pay me \$50,000 to compensate my time to deal with this matter

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Junwen Jiang

Dated

Junwen

C

First Name

Middle Initial



Plaintiff's Signature

Jiang

Last Name

7 Rye Ridge Plaza #340

Street Address

Westchester, Rye Brook

New York

10573

County, City

State

Zip Code

(646) 589-4830

tvos20170218@gmail.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.